

# ***EXHIBIT 16***

***REDACTED VERSION OF  
DOCUMENT SOUGHT TO  
BE SEALED***

# ***EXHIBIT 16***

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC, )  
Plaintiff, )  
vs. ) Case No.  
UBER TECHNOLOGIES, INC.; ) 3:17-cv-000939-WHA  
OTTOMOTTO LLC; OTTO TRUCKING, )  
INC., )  
Defendants. )  
\_\_\_\_\_ )

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF KRISTINN GUDJONSSON  
Palo Alto, California  
Friday, July 28, 2017  
Volume I

Reported by:  
CARLA SOARES  
CSR No. 5908  
JOB No. 2665814

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1 A Oh, when I would get back to them? 11:27:59

2 Q Yes.

3 A No, that would be just as soon as

4 possible.

5 Q Okay. So what does the three months refer 11:28:04

6 to?

7 A I'm sorry. I thought you were talking

8 about how far back I should be looking at his

9 activity on the machine.

10 Q Okay. So let me go back then. 11:28:12

11 So to the best of your recollection, what

12 you had agreed on is that you would look at the

13 machine and go back about three months?

14 A Two, three months, probably. Yeah.

15 Q [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 Q And then did you discuss how soon you

20 would revert to Ms. Bailey with more information? 11:28:36

21 A As quickly as possible.

22 Q When did the meeting take place?

23 A I'm sorry. Did you say "when" or "where"?

24 Q When.

25 A I'm not completely sure. A guess would be 11:28:52

1 end of January, beginning of February. Not sure. 11:28:59

2 Q Was that meeting in person?

3 A Me and Gary were in person, and then they

4 were over VC, over videoconference.

5 Q Where is Ms. Bailey located? 11:29:18

6 A I think she is in the Google X building.

7 Q I'm sorry. You said that some lawyer was

8 involved. Do you recall which lawyer?

9 A No, I don't. Sorry. I'm terrible with

10 names. 11:29:36

11 Q But is it fair to say it was an in-house

12 Google lawyer?

13 A Yes.

14 Q Okay. And I believe you said earlier that

15 they had provided some clarification. Is that 11:30:06

16 Ms. Bailey or the attorney or both?

17 A Probably both, but I don't recall.

18 Q What did you do after the meeting in terms

19 of the investigation?

20 A I started a tracking doc. 11:30:34

21 Q Did you say "a tracking doc"?

22 A I create a -- what we call [REDACTED]

23 [REDACTED]

24 and a subsequent tracking doc.

25 Q Okay. And what information did you put in 11:30:53

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were administered an oath; that  
8 a record of the proceedings was made by me using  
9 machine shorthand which was thereafter transcribed  
10 under my direction; that the foregoing transcript is  
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to  
13 the original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review  
15 of the transcript [ ] was [X] was not requested.

16 I further certify I am neither financially  
17 interested in the action nor a relative or employee  
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21 Dated: 7/29/2017

22  
23 

24 CARLA SOARES

25 CSR No. 5908